

THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS

CRIMINAL DIVISION

STATE OF OHIO

: NO. B1900066

Plaintiff

: (Judge Jerome J. Metz)

vs.

BILL OF PARTICULARS

ANTHONY WORTHINGTON

Defendant



D125047310

CLERK OF COURTS
HAMILTON COUNTY, OHIO
COMMON PLEAS

2019 APR -4 A 10:32

FILED

Now comes the State of Ohio, by and through Assistant Prosecuting Attorneys, Anne Flanagan and Elizabeth Polston, and in response to Defendant's Request for Bill of Particulars states as follows:

In addition to the allegations set forth within the Indictment, the State further asserts that

On or about 12:40PM on 1-4-19, in the vicinity of 6679 Schweitzerhoff Rd., 45251 Apt C1(Colerain Twp), 13 month old Raegan Worthington was found lying face down and unresponsive in a bed, she shared with a 7 year old sibling.

The Defendant at some point told police after Fire and Rescue personnel had arrived, that they should "narc" the child, since he said he thought the child might have 'gotten into something'. Narcan was tried unsuccessfully as the child was taken to CCHMC, but she remained in full arrest.

Back at the scene, the Defendant was told to remain outside the home, but was then observed leaning into a window speaking with his niece, a juvenile age 15. Police intercepted the 15 year old child attempting to dispose of drugs at the request of the Defendant. These drugs were recovered and contained crystal methamphetamine in an amount over bulk, indicative of trafficking in drugs. The teen said she planned to flush the bag of drugs down the toilet in order to do what her uncle had asked of her. The Defendant admitted these drugs were his.

The defendant also admitted having a rock of heroin in his sock when he fell asleep on a bed in the same room where the decedent child and the other children had been playing and watching TV. When he awoke the rock was no longer in his sock.

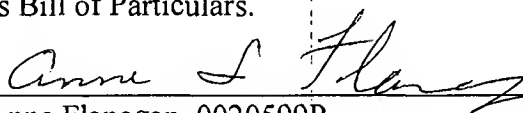
A rock matching its description was found under the child's pillow, in a bed she shared with the 7 year old child (AB) who reportedly has physical ailments. In addition

to the 7 yr old, the decedent child, and the 15 yr old, there was also a 2 year old boy (AW) in the household playing nearby the other children and in the area where Defendant said he fell asleep with the drugs.

The lab has analyzed the rock recovered from the bed and it to contain heroin, fentanyl and tramadol.

The child's blood revealed she had consumed a toxic amount of Fentanyl. The coroner has ruled the death a homicide as a result of the toxic ingestion of the drug. The child's autopsy revealed no congenital issues, no infectious disease, no malignancy nor any inflicted injuries, which could otherwise account for the child's death. The toxic consumption of the drug Fentanyl was determined to be the cause of her death.

The indictment is hereby incorporated into this Bill of Particulars.

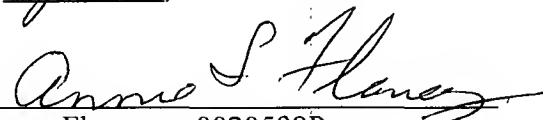

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served upon each party or attorney of record in the proceedings for each party by on the 4th day of April, 2019.


Anne Flanagan, 0020599P or
Elizabeth Polston, 0083708P
Assistant Prosecuting Attorney